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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

In the matter of:

United States of America : Case No.: 2:24-mj-478

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Jacob M. Rager :

879 Woodhill Drive : Magistrate Judge: Vascura

Columbus, OH 43212 :

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Matthew W. Guinn, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state:

INTRODUCTION

- 1. I, Special Agent Matt Guinn (your affiant), make this affidavit in support of a criminal complaint to arrest for violations 18 U.S.C. §§ 2252, 2252A, and 2422(b) the distribution, receipt, and/or possession of child pornography as well as 18 USC § 875(d) extortion via interstate communications. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Jacob M. Rager (RAGER) committed the violations listed above.
- 2. I am a Special Agent (SA) with the FBI and have been since April 2012. I am currently assigned to the Child Exploitation and Human Trafficking Task Force Crimes Against Children Squad, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children.
- 3. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have received both formal and informal training in the detection and investigation of computer-related offenses involving children. As part of my duties as a SA, I investigate criminal violations relating to child exploitation and child pornography, including the online enticement of minors and the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422.

PROBABLE CAUSE

- 4. On or about April 3, 2023, Jane Doe One contacted the FBI National Threat Operations Center (NTOC) to report the distribution of underage nude photos which depicted Jane Doe One when she was 17 years of age. In summary, the report indicated that Jane Doe One had been contacted in February 2022 by an unknown individual utilizing the Instagram account ruomaid_. The ruomaid_ account requested nude photos of Jane Doe One which Jane Doe One ultimately sent depicting her breasts and possibly her butt. After the photos were distributed to the ruomaid_ account, Jane Doe One was not contacted by that account again.
- 5. On or about November 2, 2022, Jane Doe One received another request for nude images of herself. In exchange, Jane Doe One was offered \$15. Jane Doe One distributed one photo of her breasts and in return, received the \$15. More specifically, Jane Doe One had \$15 placed in her CashApp account by username \$Papaburrr22 with a note in the transaction line which read "for gas."
- 6. In or around March 2023, Jane Doe One received a message from an Instagram account with the username jlyn2223. In summary, the jlyn2223 account requested Jane Doe One send \$15 and more photos of herself or Jane Doe's photos would be sent to her friends via her Instagram friends list. Jane Doe One did not comply with this demand.
- 7. A friend from high school then reached out to Jane Doe One after randomly receiving nude photos of Jane Doe One. The message sent to Jane Doe One's friend via an unknown Instagram account read "Do you know [Jane Doe One]?" and accompanying that message were multiple nude photos of Jane Doe One.
- 8. On or about April 27, 2023, a subpoena was served on Meta requesting records for two Instagram accounts. In response, Meta provided the following subscriber records for the jlyn2223 account:

Registered Email Registration Date bankofmyra22@gmail.com 2023-04-03 22:28:37 UTC

Registration IP

2600:387:f:5a31::4

Logins

IP Address 2600:1700:4280:4220:36:9819:e276:b3b9

Time 2023-04-12 16:49:01 UTC IP Address 2600:387:f:5a31::4 Time 2023-04-03 22:28:39 UTC

- 9. Meta also provided the following subscriber information for the ruomaid_account: registered email bankofmyra22@gmail.com with a registration date of 2023-03-14 14:20:45 UTC as well as numerous registration and log in IP Addresses.
- 10. On or about May 15, 2023, a subpoena was served on Google, LLC requesting records for the registered email account on both Instagram accounts which was listed as bankofmyra22@gmail.com. In response, Google provided numerous registration and log in IP Addresses.

- 11. Your affiant learned that the IP addresses listed in both the Meta and Google returns had IP addresses that resolved to AT&T. On or about May 15, 2023, a subpoena was served to AT&T requesting records for IP address information related to the subscriber on the above IP addresses provided by Meta and Google. In response, AT&T provided subscriber record information which listed an account name and an address of 879 Woodhill Drive in Columbus, Ohio.
- 12. Open-source checks via Ohio Law Enforcement Gateway (OHLEG) and ACCURINT also showed that an individual by the name of Jacob Marshall Rager (**RAGER**) with a date of birth 07/08/2003 resided at the 879 Woodhill Drive in Columbus, Ohio as well.
- 13. On or about April 17, 2023, legal process was served to Block, Inc. for CashApp records relating to the CashApp handle \$Papaburrr22, which is the account that paid Jane Doe One \$15 for a nude photograph. In response, Block, Inc. provided the following records:

Identity Verification Name: JACOB MARSHALL RAGER

Date of Birth: 2003-07-08

Address: 879 Woodhill Dr, Columbus, OH 43212

Telephone: 6146483561

14. On or about June 2, 2023, legal process was served on AT&T requesting records for telephone number (614) 648-3561 which was the telephone number provided in the aforementioned record returns from Block Inc. In response, AT&T provided the following subscriber records:

Name: JACOB RAGER

User Address: WOODHILL DRIVE, Columbus, Ohio

Service Start Date: 07/31/2020 Contact Name: JACOB RAGER

- 15. On or about August 17, 2023, Jane Doe One informed your affiant that she received additional online threats and provided your affiant with a screenshot from TikTok user noted as @user3151780805616. This user sent the following messages to Jane Doe One "I have your nudes [Jane Doe One]...Unblock my instagram or else I'm gonna post you online I'm giving you a chance". Subscriber records for the TikTok user @user3151780805616 were requested and the telephone number (614) 648-3561, previously identified as being associated with RAGER, was listed as the signup registration number. Subscriber records also provided IP logs and, of note, was that the IP address of 162.237.99.167 was listed and came back to a location at the 879 Woodhill Drive in Columbus, Ohio.
- 16. On October 18, 2023, Jane Doe One informed your affiant that she received the following text messages from the TikTok account, Grayson Brage @grayson.brage: "I have your nudes still [Jane Doe One]. Reply unless you want me to expose you to everyone you know" 'See for yourself. Reply if you want to me to remove it. Be good.". A link to EroMe was also sent to Jane Doe One.

- 17. On October 18, 2023, FBI Columbus submitted a preservation request to EroMe.com for the EroMe account used to contact Jane Doe One. In response, EroMe provided subscriber information and IP logs for EroMe which indicated the email address that created the account was ragerjacob848@gmail.com.
- 18. On or about June 2, 2023, your affiant served a subpoena on Google requesting records for ragerjacob848@gmail.com. In response, Google provided the following records:

Name:

Jacob Rager

e-Mail:

ragerjacob848@gmail.com

Created On:

2019-07-24 00:04:27

- 19. On or about October 27, 2023, your affiant served a subpoena on TikTok requesting subscriber records for the following: @Grayson.brage. In response, TikTok provided subscriber records which included the email utilized to sign up for the account which was listed as bragegrayson@gmail.com and the IP address logins were also provided.
- 20. On or about November 16, 2023, your affiant served a on Google requesting records for bragegrayson@gmail.com. In response, Google provided information related to the IP addresses the account used as well as the recovery email address that was provided by the user and noted as cavebob4206934@gmail.com.
- 21. On or about February 7, 2024, your affiant served a subpoena on Google requesting records for cavebob4206934@gmail.com. In response, Google provided IP address log in information and a recovery telephone number listed as +16146483561.
- 22. Notably, email accounts bragegrayson@gmail.com and cavebob4206934@gmail.com share IP address log-ins on 2023-10-18, 2600:1700:4280:4220:40d:c218:7f38:29db; the recovery SMS number for cavebob4206934@gmail.com is 16146483561, previously identified as belonging to Jacob M. Rager. In addition, AT&T provided the address of 879 Woodhill Drive, Columbus, OH as the subscriber address for the terms of service IP address 2600:1700:4280:4220:203b:5449:754d:1e6/2023-09-28 06:51:01 Z associated with bragegrayson@gmail.com.
- 23. On October 24, 2023, your affiant obtained a federal search warrant for the Instagram accounts jlyn2223 and ruomaid. In review of the return results obtained, your affiant noted nude, sexually explicit photographs of Jane Doe One. In addition, your affiant noted that the jlyn2223 account also posted nude photographs of two additional females, herein after referred to as Jane Doe Two and Jane Doe Three.
- 24. On or about November 11, 2023, an interview with Jane Doe Three was conducted during which Jane Doe Three stated that on or about October 18, 2023, the Instagram user "Grayy.brag" commented on one of her Instagram posts and then posted a link to a Mega site that contained 70 folders. Jane Doe Three noticed that the folders within the link were named after girls who attended Ohio University, including a folder which contained images of herself. The folders each contained images and videos that appeared to have been saved from the Snapchat account of each girl there was a folder for. Jane Doe Three

¹ Jane Doe Two was identified by law enforcement after images of her were recovered in the initial target Instagram accounts. Law Enforcement has not yet been able to conduct a full interview with Jane Doe Two.

informed your affiant that she appeared to be one of the most recent girls in the folders and that most of them depicted or named had already graduated. Jane Doe Three also confirmed that she was under the age of eighteen when depicted in the images contained in the folder with her name and did not know how someone had obtained her photographs. Jane Doe Three noted that some of the images in the folder with her name that depicted her had marking on the images which altered the photograph or covered her face. Jane Doe Three informed your affiant that someone else did that to her photographs and that was not their original state in which she had taken or saved them. Jane Doe Three confirmed that one other girl named within the folders attacked to the Mega link was under the age of eighteen.

- 25. In further conversation with Jane Doe Three, she indicated that she was also sent the following message by the Instagram user "kynallollersdestruction" "hi [Jane Doe Three]. i have your nudes still. unless you want me to show your friends, family and both your brothers i suggest you reply. im gonna make an example out of you if you dont reply". Jane Doe Three provided screenshots to your affiant, including a screenshot of the "kynallollersdestruction" Instagram page which was private. The profile image for that account was visible and depicted a female taking a photograph of herself in a mirror wearing a bra. The female's face was covered by red markings. The profile "kynallollersdestruction" also had the following sentence listed on the account homepage: "follow me if you wanna see her."
- 26. Subscriber records for Instagram user "kynallollersdestruction and its subscriber email, nia81244@gmail.com, indicated that both accounts were created on the same day, September 28, 2023 at 879 Woodhill Drive, Columbus, OH 43212-3760.
- 27. Your affiant further learned that a friend of Jane Doe Three received an Instagram message from an Instagram account titled "ooopperrating" which stated, "I wanna rape you so bad...I wanna tie you up with your sis and take turns seeing who's got the tighter anus...Then make your mom watch you get raped over and over again, then her too...I know where you live....I'm gonna make an absolute mess outta yku unless you do what I say...Reply or this gets worse...Send nudes...Do you know [Jane Doe Three]."
- 28. On or about November 08, 2023, your affiant served a subpoena on Meta Platforms requesting records for Instagram User @Ooopperrating. In response, Meta provided subscriber information indicating that Jacob M. Rager created the Instagram account and the subscriber email address while staying with his girlfriend in Jeffersonville, Ohio.
- 29. A search warrant, issued in the United States District Court for the Southern District of Ohio, was executed by FBI search personnel at 225 Woodsview Drive, Apartment A, Jeffersonville, Ohio 43128, on January 26, 2024. The purpose of the search was to locate and seize evidence, contraband, fruits, and/or instrumentalities related to violations of federal law for child exploitation and sextortion offenses. Pursuant to the search warrant, an iPhone belonging to **RAGER**, was seized.
- 30. Messages from the TikTok application were recovered which included messages **RAGER** sent to Jane Doe One. For example, in August 2023 and October 2023, the following messages were distributed by **RAGER** about Jane Doe One and Jane Doe Three:

August 2023

RAGER: I have your nudes [Jane Doe One]

RAGER: Unblock my instagram and send more or else I'm gonna post you

online

RAGER: I'm giving you a chance

September 2023

RAGER: I have your nudes still [Jane Doe Three]. Reply unless you want me

to expose you to everyone in grandview

RAGER: I have your nudes still [Jane Doe One]. Reply unless you want me

to expose you to everyone u know

RAGER: [distributed a Erome.com website depicting Jane Doe One) **RAGER:** See for yourself. Reply if you want to me remove it. Be good.

31. Numerous images of Jane Doe One and Two were recovered from **RAGER's** cell phone. The images depicted Jane Doe One wearing underwear, posing in a mirror. The images of Jane Doe Two depicted her topless or with her breasts visible while she lifted up her shirt.

- 32. In addition, child exploitation material was recovered from **RAGER's** device. For example, the following files were noted:
 - One image of a minor female approximately 12 14 years old inserting a bottle into her vagina;
 - One image of a minor female approximately 10 13 years old squatting down with vagina and breasts exposed;
 - One image of a minor female approximately 13 15 years depicted fully nude, inserting a brush into her vagina)
 - One video, titled 10Yo Nude Girl-Keek-Webcam-Saff-Mix1 fav.mp4 that was approximately one minute and thirty-eight seconds in late which depicted a pre-pubescent female, fully nude with vagina and anus visible.
- 33. On or about April 5, 2024, your affiant served a federal target letter on **RAGER**. On May 30, 2024, your affiant learned **RAGER** called the United States District Court, Southern District of Ohio and informed that Court that he planned to complete the financial affidavit that accompanied the target letter and would submit it to the Court. **RAGER** was then appointed an attorney and informed more fully of the investigation against him.
- 34. On or about July 19, 2024, Jane Doe Three informed your affiant that she received an unsolicited message from TikTok user "henry17621" that read, "you're gorgeous, your nudes are awesome."
- 35. In response to a subpoena sent by your affiant, TikTok provided IP address information and subscriber information for the "henry17621" account associated to the email address ragerjacob97@gmail.com which had been established as RAGER's email address above. The IP address also linked back to RAGER as well.

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- 36. On September 5, 2024, Jane Doe Three again informed your affiant that she received an unsolicited message from Instagram User "noodlier" stating, "I'll send you \$100 for NSFW content....Your body is amazing...I wanna make you choke on my cock...I wanna blow a load on your pretty face."
- 37. In response to a subpoena, Instagram provided the following subscriber records and IP address login information for the "noodlier" account. The IP addresses resolved to AT&T and came back to RAGER's address at 879 WOODHILL DR, COLUMBUS, OH 43212-3760.
- 38. Based upon the foregoing, your affiant submits that there is probable cause to believe that Jacob A. RAGER has committed violations of 18 U.S.C. §§ 2252, 2252A – the distribution, receipt, and/or possession of child pornography as well as the 18 USC § 875(d) – extortion via interstate communications. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

Matthew W. Guinn Special Agent Federal Bureau of Investigation

Sworn to and subscribed before me this 2nd day of October, 2024.

Honorable Chesley A. Vascura